

1 Kirsten A. Milton, Bar No. 14401
2 **JACKSON LEWIS P.C.**
3 300 S. Fourth Street, Suite 900
4 Las Vegas, Nevada 89101
5 kirsten.milton@jacksonlewis.com
6 Tel: (702) 921-2460

7 *Attorneys for Defendant GNLV LLC*
8 *dba Golden Nugget Las Vegas Hotel*
9 *and Casino*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 TIMOTHY DICKENS,

13 Plaintiff,

14 vs.

15 GNLV LLC, doing business as GOLDEN
16 NUGGET LAS VEGAS HOTEL AND
17 CASINO,

18 Defendant.

Case No. 2:21-cv-00087-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S DEADLINE TO
FILE ITS REPLY IN SUPPORT OF ITS
MOTION FOR SUMMARY JUDGMENT**

(FIRST REQUEST)

19 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, all parties hereby stipulate to extend the
20 time for Defendant to file its Reply in Support of Its Motion for Summary Judgment (the "Reply").
21 This is the parties' first request specifically to extend this deadline.¹ Defendant's current deadline
22 is August 11, 2023. This request is sought in good faith and not for purposes of undue delay.

23 This extension is necessary because Defendant's in-house employee responsible for
24 managing this litigation is out of the country for two weeks. And, on the subsequent third week,
25 Defense counsel, who is solely responsible for this case, will be on a pre-planned family vacation.
26 Therefore, Defendant needs additional time to prepare and finalize its Reply.

27 ¹ The parties have made previous requests to extend the dispositive motion deadlines as set forth in the May
28 5, 2021 Order; however, in the past, the extensions were based either on the fact that the parties had to extend the
discovery deadline or at Plaintiff's request to extend the deadline for him to file his Response. ECF Nos. 15, 35, 43,
45, 47, 49, and 51. This is only the first request by Defendant specifically to extend its Reply deadline.

1 Therefore, Plaintiff's counsel has agreed and the parties hereby stipulate that Defendant
2 shall have up to and including September 11 2023, to file its Reply.

3 Dated this 9th day of August, 2023.

4
5 MULLINS & TRENCHAK, ATTORNEYS
AT LAW.

JACKSON LEWIS P.C.

6 /s/ Philip J. Trenchak
Philip J. Trenchak, Esq., Bar No. 9924
7 1614 S. Maryland Parkway
Las Vegas, NV 89104

/s/ Kirsten A. Milton
Kirsten A. Milton, Bar No. 14401
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

8 *Attorney for Plaintiff Timothy Dickens*

Attorneys for Defendant
GNLV Corp dba Golden Nugget Las Vegas

10
11 **ORDER**

12 IT IS SO ORDERED.

13 
14 _____
ANDREW P. GORDON
15 UNITED STATES DISTRICT JUDGE

16 Dated: August 11, 2023
17
18
19
20
21
22
23
24
25
26
27
28